
United States District Court

WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Case Number: 21-MJ-00137-WBG

GREGORY T. ROMAN
[DOB: 5/16/1965]

COUNTS ONE AND TWO:

Cyberstalking

18 U.S.C. § 2261A(2)

NMT: Five Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: NMT Three Years

Class D Felony

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT ONE
(Cyberstalking)

Between on or about October 18, 2021, and October 28, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **GREGORY T. ROMAN**, with the intent to harass and intimidate Victim 1, used an interactive computer service, and an electronic communication service, and an electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce, to engage in a course of conduct that placed Victim 1 in reasonable fear of death or serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1, all in violation of Title 18, United States Code, Sections 2261A(2).

COUNT TWO
(Cyberstalking)

Between on or about October 18, 2021, and October 22, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **GREGORY T. ROMAN**, with the intent to harass and intimidate Victim 2, used an interactive computer service, and an electronic communication service, and an electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce, to engage in a course of conduct that placed Victim 2 in reasonable fear of death or serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 2, all in violation of Title 18, United States Code, Sections 2261A(2).

I further state that I am a F.B.I. Special Agent and that this complaint is based on the following facts:

(See attached affidavit.)

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Christopher Blair

Christopher Blair
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed to me by telephone,

December 20, 2021 at 2:04 pm
Date

at Kansas City, Missouri
City and State

HONORABLE W. BRIAN GADDY
United States Magistrate Judge
Name and Title of Judicial Officer

WBG
Signature of Judicial Officer

